

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Ida F. Spruill Debtor(s) Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania Objectant(s) v. Ida F. Spruill Respondent(s)	Chapter 13 Proceeding No. 25-10117 PMM
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OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania, a secured creditor in this case objects to the Plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on January 10, 2025, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania is the holder of a secured lien against the debtor's property located at 1114 W. Nevada St., Phildelphia, PA 19133.
3. Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania is in the process of drafting its Proof of Claim. The estimated pre-petition arrears due Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania is \$11,722.89 and the estimated total

claim is \$56,330.31. Once its Proof of Claim is filed Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania shall amend this Objection to Plan.

4. Debtor's Plan proposes to pay CCO Mortgage Corp. \$6,092.00 in pre-petition arrears, an amount substantially smaller than Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania's estimated arrears claim.
5. If the Plan is confirmed Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy
Attorney I.D. No. 77149
1310 Industrial Blvd.
1st Floor, Suite 101
Southampton, PA 18966
215-942-9690 phone
215-942-9695 fax
Attorney for Citizens Bank, N.A.
s/b/m to Citizens Bank of
Pennsylvania